Bemis/Ivex SF/TECH **CERCLA** SITE REASSESSMENT Illinois Environmental Protection Agency

SITE REASSESMENT For

Bemis Corporation / Ivex Peoria, Illinois December, 2007

ILLINOIS ENVIRONMETAL PROTECTION
AGENCY
OFFICE OF
SITE EVALUATION

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SITE REASSESSMENT

Section 1.0 Introduction

On April 11, 2007, the Illinois Environmental Protection Agency's (Illinois EPA)

Office of Site Evaluation was tasked by the Region V Offices of United

Environmental Protection Agency (U.S. EPA) to conduct a Site Reassessment at
the Bemis Corporation / Ivex site located in Peoria, Illinois. This site is located in
the central part of Section 35, Township 9 North, Range 8 East of the Third

Principal Meridian, Peoria County, Illinois (Figure 1).

Current U.S. EPA policy stipulates that a Site Reassessment be conducted to determine the current status of Bemis Corporation / Ivex. This Site Reassessment will consist of an evaluation of recent information to determine if further Superfund investigation is warranted. The reassessment will supplement previous assessment work, and is not intended to replace previous CERCLA assessments.

The Site Reassessment is designed to provide necessary information that will help determine if the site qualifies for possible inclusion on the National Priorities List, or should receive a No Further Remedial Action Planned (NFRAP) designation. At the end of the reassessment process the author will recommend that the site may be given a NFRAP designation, receive further Superfund investigation, or referred to another state or federal cleanup program. The Site Reassessment is performed under the authority of the Comprehensive Environmental Response,

Compensation and Liability Act (CERCLA) commonly known as Superfund.

The Bemis Corporation / Ivex site was placed on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERLCIS) in 1980. In June of 1995, Illinois EPA conducted a Site Inspection Prioritization (SIP) of the site. The Site Reassessment Report will describe current site conditions and illustrate how the site has changed since the initial CERCLA SIP. This report will contain a review of existing information to determine site history, current site conditions, and evaluate analytical data that may exist on the site. The Site Reassessment will also support emergency response or time-critical removal activities if it is determined that they are warranted.

Section 2.0 Site Description and History

2.1 Site Description

The site is located in Peoria, Illinois approximately 1/8 mile east of the intersection of Sloan Street and Adams Street. The site is presently owned by two independent companies; Bemis Corporation occupies 13.7 acres on the south side of the property and Ivex owns 33.7 acres on the north side of the property. Bemis no longer utilizes their property but appears to be leasing a portion of it to a steel fabrication company. Ivex has an active manufacturing operation on their parcel of land.

The site has several large warehouse type buildings covering approximately 40 percent of the total land mass. The open areas are a mixture of paved areas and

gravel/urban fill areas. The paved areas are primarily used for parking lots and roadways. The gravel/urban fill areas are primarily open with the exception of the steel fabrication storage yard. This is small area used to temporally hold finished structural steel products before they are shipped to the end user.

The site is located in an urban-industrial setting along the western bank of the Illinois River. The topography slopes gently toward the Illinois River. (Figure 2) To the north of the site is a small auto scrap yard, to the west an abandoned car wash and gas station, and to the south a marina and restaurant. An active north south rail line borders the western portion of the property. The Illinois River flows north to south and forms the eastern border of the site. The geology of the area, based on Illinois EPA records, consists of a sandy silt to sandy loams underlain by the Sankoty Sand Member. The site is prone to frequent flooding.

2.2 Operational History

Bemis Brother Bag Company built its first paper mill at Peoria, Illinois, to produce a tough paper made from pulp and rope stock. The location of the paper mill is the subject of this report. Operations included a paper mill, a coating mill, and a multiwall bag converting plant. The plant contained a plate-making department that did printing with water based ink, and a converting operation that assembled the bags for bulky products such as dog food. Originally, power requirements for the plant were met by the use of an on-site coal fired boiler with an oil fired boiler used as standby.

Regulatory involvement at the site began in 1973, when an on-site landfill was discovered at this location. The landfill consisted of a pit located on the northern part of the site where fly ash was being disposed of. At the time of the discovery the site generated 20,000 cubic feet of fly ash annually. Due to sulfur dioxide emissions caused by the coal fired boiler, a 1977 permit for the coal fired boiler was denied. The boiler was subsequently converted to use natural gas for fuel.

In 1985, Bemis Corporation sold its paper mill and coating mill to Pentratex Paper Company. In 1987, the Pentratex Paper Company went bankrupt and in 1987, Ivex purchased the mill and commenced operations. Ivex currently owns and operates the paper mill and coating mill at the site. In these operations waste paper is purchased and recycled into paper that is used for industrial packaging.

2.3 CERCLA Investigative History

CERCLA investigative activities began at the site in 1985, when the Illinois EPA conducted a Preliminary Assessment (PA) of the site. Base on the findings of that assessment a Screening Site Inspection (SSI) was conducted in 1989, by Ecology and Environment Incorporated followed by the SIP in 1995, mentioned at the beginning of this report.

Soil sampling results from the 1989 SSI revealed the presence of Polychlorinated Biphenyls (PCBs) in excess of the Toxic Substances Control Act of 1976 (TSCA)

level of ten parts per million. According to the Institute of Paper Chemistry, PCBs are associated with paper mill operations. They appear during the preparation of the paper fiber from waste paper.

The area in which contamination was discovered was located in the east-central portion of the site. This area is north-northwest of the 26 foot by 36 foot steel garage. (See Appendix A) This area is entirely located on the portion of the site currently owned by IVEX.

According to the 1995, SIP the area of contamination is approximately 7500 square feet. The SIP also documents that this are has been inundated with flood water two times since the SSI. Sediment and water samples collected during this event did not have PCBs associated with them. One production well did have elevated levels of trichloroethene which is a volatile organic compound (VOC). VOCs were not found in any of the soil samples collected during the SIP, and they are believed to originate from an off-site source. Soil sampling also indicated that Polynuclear aromatic hydrocarbons (PNAs) were elevated in this area.

Section 3 – Other Cleanup Authority Activities

Based on the findings of the SIP, in March of 1996 the site entered into the Illinois EPA's Pre-Notice Site Cleanup Program (currently called the Voluntary Site Remediation Program).

Initially Ivex submitted a *Delineation Sampling Plan*, dated March 1996 to the Illinois EPA. This was followed in March 1997 by an *Investigative Sampling Plan Ivex*. Both plans were intended to delineate the vertical extent of the PCB contamination at the site. This was accomplished by taking 10 additional soil samples at designated locations in the original area of concern (AOC). All of the soil samples collected were analyzed for PCBs and polynuclear aromatic hydrocarbons (PNAs). Sampling and analysis of ground water from the on-site production wells was also included in these plans.

According to a November 2007 interview with the plant manager for Ivex, the soil removal began in 2003. The garage was demolished to aid in the removal of the contaminated soil. The plant manager indicated that at one time this structure was a drum storage area and had a dirt/gravel floor. The excavation from the removal averaged four to five feet in depth. Once the excavation reached soil that was not contaminated the entire area was backfilled with clean fill. Soil testing was performed during this process to verify that the contaminated soil had been removed.

At the conclusion of this soil removal a comprehensive No Further Remediation (NFR) Letter was issued by the Illinois EPA on April 27, 2004. (See Appendix B)

Section 4 – Summary and Conclusions

The Bemis Corporation/Ivex site is located in Peoria, Illinois approximately 1/8 mile east of the intersection of Sloan Street and Adams Street. The site is presently owned by two independent companies; Bemis Corporation occupies 13.7 acres on the south side of the property and Ivex owns 33.7 acres on the north side of the property. Bemis no longer utilizes their property but appears to be leasing a portion of it to a steel fabrication company. Ivex has an active manufacturing operation on their parcel of land. The site is located in an urban-industrial setting along the western bank of the Illinois River. The topography slopes gently toward the Illinois River.

Through the course of several CECLA investigations one area located on the Ivex parcel was found to have PCB contamination that exceeded the TSCA levels. During one of these investigations sediment samples were collected from the Illinois River. The sample results indicated that the river has not been impacted by past or present site activities. Follow up soil sampling by the PRP of the area of concern (AOC) confirmed and delineated the original AOC. This sampling also showed that the PCBs were localized and were not migrating toward the river. No other potential sources were identified during any of these investigations.

Bemis Corporation/Ivex enrolled in the Illinois EPA's Voluntary Site Remediation Program. In 2003, a soil removal occurred in the PCB contaminated area with Illinois EPA oversight. A November 2007, site visit by the Illinois EPA's Office of Site Evaluation confirmed these activities. It was also learned that the PCB

contaminated area was a former drum storage area. After successfully meeting the clean-up standards set by the Illinois EPA the site was issued a comprehensive No Further Remediation (NFR) Letter in 2004.

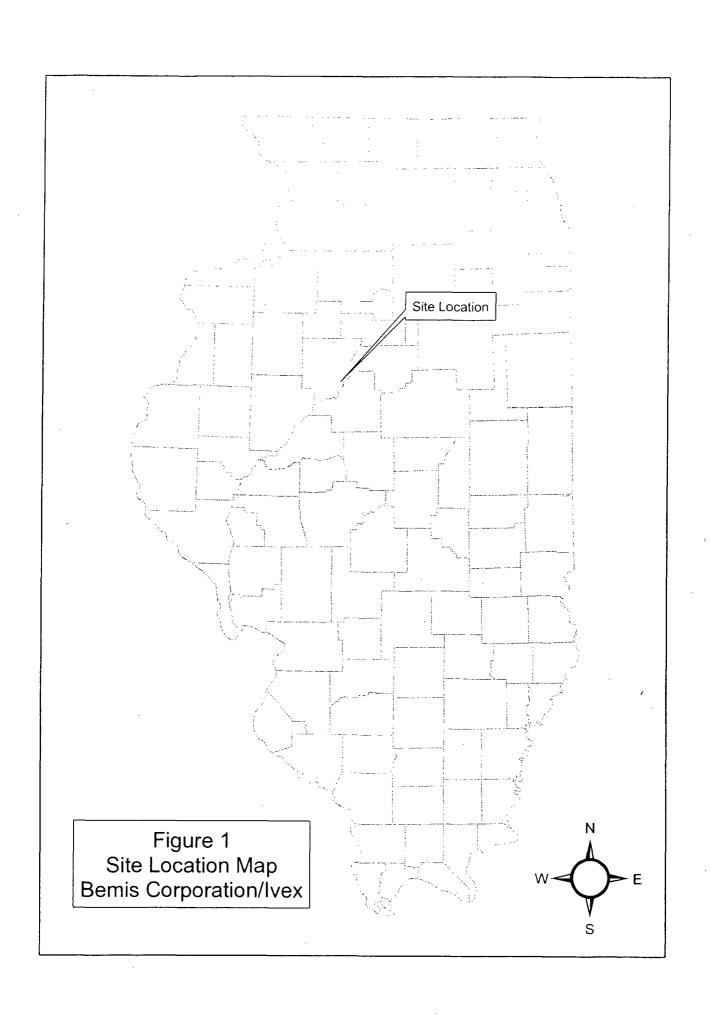
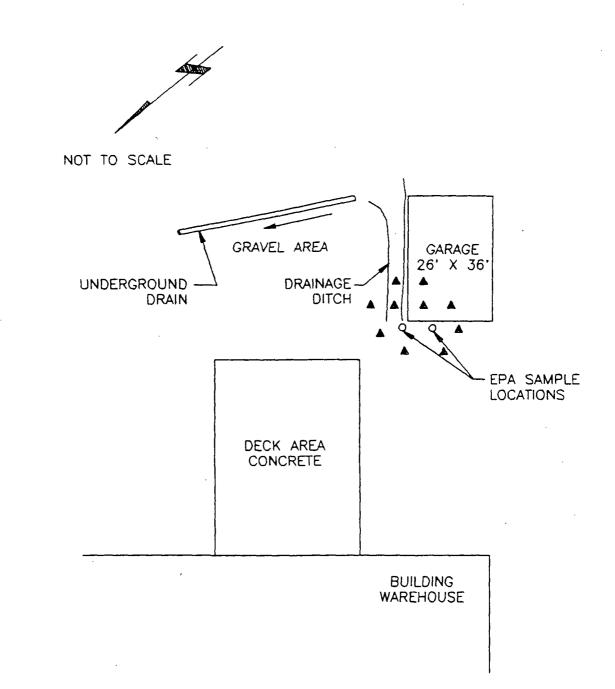




Figure 2
Site Area Map
Bemis Corporation/Ivex

Appendix A Proposed Sample Location Map



▲ = PROPOSED SAMPLING LOCATIONS

PROPOSED SAMPLE LOCATION MAP
IVEX
PEORIA, ILLINOIS



Environmental Science & Engineering, Inc.

Appendix B Illinois EPA NFR Letter



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397 LAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

(217) 782-6761

April 27, 2004

CERTIFIED MAIL
7002 3150 0000 1258 4866

Larry Rohman IVEX Packaging Corporation I Sloan Street Peoria, IL 61603

Re:

1430655015 - Peoria County

Peoria/Bemis Corp (IVEX)
Site Remediation/Technical

Dear Mr Rohman:

The Remedial Action Completion Report IVEX (dated December 2003/Log No. 03-18299), as prepared by MACTEC Engineering and Consulting, Inc. for the Bemis Corporation site property, has been reviewed by the Illinois Environmental Protection Agency ("Illinois EPA") and demonstrates that the remedial action was completed in accordance with the Investigation Report and Remedial Plan IVEX Peoria, Illinois (dated July 2001; log #02-1668).

The Remediation Site, consisting of approximately 14.25 acres, is located at the Foot of Sloan Street in Peoria, Illinois. Pursuant to Section 58.10 of the Illinois Environmental Protection Act ("Act") (415 ILCS 5/1 et seq.), your request for a no further remediation determination is granted under the conditions and terms specified in this letter. The Remediation Applicant, as identified on the Illinois EPA's Service Agreement form (received May 13, 1996/Log No. 612450), is Ivex Corporation.

This comprehensive No Further Remediation Letter ("Letter") signifies a release from further responsibilities under the Act for the performance of the approved remedial action. This Letter shall be considered prima facie evidence that the Remediation Site described in the attached Illinois EPA Site Remediation Program Environmental Notice and shown in the attached Site Base Map does not constitute a threat to human health and the environment and does not require further remediation under the Act if utilized in accordance with the terms of this Letter.

RELEAGARLE

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000 ELCIN - 595 South State Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463

BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAICH - 2125 South First First

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PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

September 17, 2009

Mr. Michael Ribordy, On Scene Coordinator Office of Superfund Region 5 Offices U.S. Environmental Protection Agency 77 West Jackson Chicago, Illinois 60604

Mr. Ribordy:

Please find enclosed copies of Site Reassessment Report and QUICKSCORE worksheets for the following sites that were scheduled for Fiscal 2009 completion.

SITE NAME	ILD NUMBER	COUNTY	RECOMMENDATION
Saw-wee-kee Forest Preserve	984839159	Kendall	NFA
USX Vessel Slips	000508209	Cook	NFA
Woodstock Die Cast	005471503	McHenry	NFA
Precision National	047731112	Jefferson	NFA
Bartlett Manufacturing	097278792	McHenry	NFA
Bemis Corporation	006215727	Peoria	NFA

We are pleased to provide you with the attached reports. Should you have any questions or comments concerning this submission please feel free to contact me, or the author of the individual reports.

Thomas Crause

incerely

Manager, Office of Site Evaluation

Division of Remediation Management

Bureau of Land

SIGNATURE PAGE

Title:	CERCLA Site Reassessment for Bemis Cor	mpany Incorporated	
Preparer:	Thomas Crause, Manager, Office of Site Evaluation, Illinois Environmental Protection Agency		
	Signature	Date	
Approval: David Brauner, Site Assessment Manager, United St Protection Agency, Region 5		United States Environmental	
	Signature	9/24/09 Date	